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11 Attorneys for PLAINTIFFS LISA MONIQUE
12 JUSTIN et al.

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 LISA MONIQUE JUSTIN, individually,
as successor to ANDRE MAURICE
16 BROWN, et al.

17 Plaintiffs,

18 vs.

19 CITY AND COUNTY OF SAN
FRANCISCO, et al.,

20 Defendants.

Case No. C05 4812 MEJ

**JOINT STIPULATION RE
CONTINUANCE OF PRETRIAL AND
TRIAL DATES; ~~PROPOSED~~ ORDER**

Trial Date: 8/27/07

1 WHEREAS, pursuant to the Court's Order, dispositive motions must be filed on March 22,
 2 2007, opposed on April 5, 2007 and heard on April 26, 2007;

3 WHEREAS, Plaintiffs counsel Randall Knox, Esq. is currently in trial in the case of *People v.*
 4 *Fallay*, San Francisco Superior Court Case No. 198118;

5 WHEREAS, trial in *People v. Fallay* is not expected to conclude until approximately the end
 6 of April 2007;

7 WHEREAS, the current schedule in this case would require Plaintiffs to oppose the
 8 Defendants' summary judgment motion while Plaintiffs' counsel is still in trial in *People v. Fallay*;

9 WHEREAS, the parties accordingly agree that there is good cause to continue the dispositive
 10 motion filing date to a date after the anticipated conclusion of *People v. Fallay*, which also
 11 necessitates a continuance of the other pretrial and trial dates in this matter;

12 Accordingly, the parties stipulate to, and hereby request a continuance of the pretrial and trial
 13 dates in this matter as follows:

DATE	CURRENT	PROPOSED
Dispositive Motion Filing Cut-Off	March 22, 2007	May 10, 2007
Opposition Deadline	April 5, 2007	May 24, 2007
Reply Deadline	April 12, 2007	May 31, 2007
Dispositive Motion Hearing Date	April 27, 2007	June 14, 2007 (at 10:00 a.m.)
Last day to meet and confer re pretrial filings (per ¶J.1 of Case Management Order)	June 28, 2007	August 30, 2007
Last day to file and serve FRCP 26(a)(3) documents and pretrial statement (per ¶J.2 of Case Management Order)	July 11, 2007	September 12, 2007
Last day to file Motions in Limine	July 11, 2007	September 12, 2007
Last day to file Oppositions to Motions in Limine	July 18, 2007	September 19, 2007
Pretrial Conference	July 26, 2007	September 27, 2007 at 10:00 a.m.
Last day to file: Trial briefs Joint Voir Dire Joint Jury Instructions Verdict Forms	July 27, 2007	September 28, 2007

1 Final Pretrial Conference	2 August 23, 2007	3 October 25, 2007 at 10:00 a.m.
4 JURY TRIAL (seven days)	5 August 27, 2007	6 October 29, 2007 at 7 1:30-5:00 p.m., 8 Mon-Thurs.

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IT IS SO STIPULATED:

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Dated: March 12, 2007

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City Attorney
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JOANNE HOEPER
Chief Trial Attorney
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BLAKE P. LOEBS
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KIMBERLY A. BLISS
16
Deputy City Attorneys

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By: _____ /s/
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KIMBERLY A. BLISS
19
Attorneys for Defendants CITY AND COUNTY OF
20
SAN FRANCISCO et al.

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Dated: March 12, 2007

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RANDALL KNOX, ESQ.

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By: _____ /s/
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RANDALL KNOX, ESQ.
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Attorneys for Plaintiffs LISA MONIQUE JUSTIN et al.

[PROPOSED] ORDER

Based on the Stipulation of the parties and good cause appearing therefore, the pretrial and trial dates in this matter are continued as follows:

IT IS SO ORDERED.

March 13, 2007

Dated: _____

